

Fill in this information to identify the case:

United States Bankruptcy Court for the:

_____ District of **Puerto Rico**
(State)

Case number (if known): _____ Chapter **11**

☐ Check if this is an amended filing

Official Form 201

Voluntary Petition for Non-Individuals Filing for Bankruptcy

04/22

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name

CAPETE CORPORATION

2. All other names debtor used in the last 8 years

DBA Motel Oriente

Include any assumed names, trade names, and *doing business* as names

3. Debtor's federal Employer Identification Number (EIN)

6 6 - 0 5 3 8 1 7 3

4. Debtor's address

Principal place of business

Carr 181 KM 2.9 Quemado Ward

Number Street

San Lorenzo PR 00754

City State ZIP Code

San Lorenzo

County

Mailing address, if different from principal place of business

PO Box 518

Number Street

P.O. Box

Las Piedras PR 00771

City State ZIP Code

Location of principal assets, if different from principal place of business

Number Street

City State ZIP Code

5. Debtor's website (URL)

Debtor	CAPETE CORPORATION	Case number (if known)	
<div style="border-top: 1px solid black; margin-top: 10px;"></div>			
6. Type of debtor	<div style="margin-bottom: 10px;"><input checked="" type="checkbox"/> Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))</div> <div style="margin-bottom: 10px;"><input type="checkbox"/> Partnership (excluding LLP)</div> <div style="margin-bottom: 10px;"><input type="checkbox"/> Other. Specify: _____</div>		
<div style="border-top: 1px solid black; margin-top: 10px;"></div>			
7. Describe debtor's business	<div style="margin-bottom: 10px;">A. Check one:</div> <div style="margin-bottom: 10px;"><input type="checkbox"/> Health Care Business (as defined in 11 U.S.C. § 101(27A))</div> <div style="margin-bottom: 10px;"><input type="checkbox"/> Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))</div> <div style="margin-bottom: 10px;"><input type="checkbox"/> Railroad (as defined in 11 U.S.C. § 101(44))</div> <div style="margin-bottom: 10px;"><input type="checkbox"/> Stockbroker (as defined in 11 U.S.C. § 101(53A))</div> <div style="margin-bottom: 10px;"><input type="checkbox"/> Commodity Broker (as defined in 11 U.S.C. § 101(6))</div> <div style="margin-bottom: 10px;"><input type="checkbox"/> Clearing Bank (as defined in 11 U.S.C. § 781(3))</div> <div style="margin-bottom: 10px;"><input checked="" type="checkbox"/> None of the above</div> <div style="border-top: 1px solid black; margin-top: 10px;"></div> <div style="margin-bottom: 10px;">B. Check all that apply:</div> <div style="margin-bottom: 10px;"><input type="checkbox"/> Tax-exempt entity (as described in 26 U.S.C. § 501)</div> <div style="margin-bottom: 10px;"><input type="checkbox"/> Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. § 80a-3)</div> <div style="margin-bottom: 10px;"><input type="checkbox"/> Investment advisor (as defined in 15 U.S.C. § 80b-2(a)(11))</div> <div style="border-top: 1px solid black; margin-top: 10px;"></div> <div style="margin-bottom: 10px;">C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See http://www.uscourts.gov/four-digit-national-association-naics-codes .</div> <div style="margin-bottom: 10px;"><div style="display: flex; align-items: center; gap: 10px;"><div style="border-bottom: 1px solid black; width: 20px; text-align: center;">7</div><div style="border-bottom: 1px solid black; width: 20px; text-align: center;">2</div><div style="border-bottom: 1px solid black; width: 20px; text-align: center;">1</div><div style="border-bottom: 1px solid black; width: 20px; text-align: center;">1</div><div style="font-size: 1.2em;">+</div></div></div>		
<div style="border-top: 1px solid black; margin-top: 10px;"></div>			
8. Under which chapter of the Bankruptcy Code is the debtor filing?	<div style="margin-bottom: 10px;">Check one:</div> <div style="margin-bottom: 10px;"><input type="checkbox"/> Chapter 7</div> <div style="margin-bottom: 10px;"><input type="checkbox"/> Chapter 9</div> <div style="margin-bottom: 10px;"><input checked="" type="checkbox"/> Chapter 11. Check all that apply:</div> <div style="margin-bottom: 10px;"><input type="checkbox"/> Debtor's aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$3,024,725 (amount subject to adjustment on 4/01/25 and every 3 years after that).</div> <div style="margin-bottom: 10px;"><input type="checkbox"/> The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D). If the debtor is a small business debtor, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if all of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).</div> <div style="margin-bottom: 10px;"><input type="checkbox"/> The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D), and it chooses to proceed under Subchapter V of Chapter 11.</div> <div style="margin-bottom: 10px;"><input type="checkbox"/> A plan is being filed with this petition.</div> <div style="margin-bottom: 10px;"><input type="checkbox"/> Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).</div> <div style="margin-bottom: 10px;"><input type="checkbox"/> The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the <i>Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11</i> (Official Form 201A) with this form.</div> <div style="margin-bottom: 10px;"><input type="checkbox"/> The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.</div> <div style="margin-bottom: 10px;"><input type="checkbox"/> Chapter 12</div>		
<div style="border-top: 1px solid black; margin-top: 10px;"></div>			
9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?	<div style="margin-bottom: 10px;"><input checked="" type="checkbox"/> No</div> <div style="margin-bottom: 10px;"><input type="checkbox"/> Yes. District _____ When _____ Case number _____</div> <div style="margin-bottom: 10px; text-align: center;">MM / DD / YYYY</div> <div style="margin-bottom: 10px;">If more than 2 cases, attach a separate list.</div> <div style="margin-bottom: 10px;">District _____ When _____ Case number _____</div> <div style="margin-bottom: 10px; text-align: center;">MM / DD / YYYY</div>		
<div style="border-top: 1px solid black; margin-top: 10px;"></div>			

Debtor CAPETE CORPORATION Case number (if known) _____
Name

10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?

☐ No

☒ Yes.

Debtor Caribbean Motel Corporation

Relationship Stockholder

District USBC-District of Puerto Rico

When 06/15/2021

List all cases. If more than 1, attach a separate list.

Case number, if known 21-01831

MM / DD / YYYY

11. Why is the case filed in this district?

Check all that apply:

☒

Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.

☐

A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?

☒ No

☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.

Why does the property need immediate attention? (Check all that apply.)

☐

It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.

What is the hazard? _____

☐

It needs to be physically secured or protected from the weather.

☐

It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).

☐

Other _____

Where is the property?

Number Street

City

State ZIP Code

Is the property insured?

☐

No

☐

Yes. Insurance agency _____

Contact name _____

Phone _____

Statistical and administrative information

13. Debtor's estimation of available funds

Check one:

☒

Funds will be available for distribution to unsecured creditors.

☐

After any administrative expenses are paid, no funds will be available for distribution to unsecured creditors.

14. Estimated number of creditors

☒ 1-49

☐ 50-99

☐ 100-199

☐ 200-999

☐ 1,000-5,000

☐ 5,001-10,000

☐ 10,001-25,000

☐ 25,001-50,000

☐ 50,001-100,000

☐ More than 100,000

Debtor	<u>CAPETE CORPORATION</u>		Case number (if known)	_____
	Name			
15. Estimated assets	<input type="checkbox"/> \$0-\$50,000 <input type="checkbox"/> \$50,001-\$100,000 <input type="checkbox"/> \$100,001-\$500,000 <input checked="" type="checkbox"/> \$500,001-\$1 million	<input type="checkbox"/> \$1,000,001-\$10 million <input type="checkbox"/> \$10,000,001-\$50 million <input type="checkbox"/> \$50,000,001-\$100 million <input type="checkbox"/> \$100,000,001-\$500 million	<input type="checkbox"/> \$500,000,001-\$1 billion <input type="checkbox"/> \$1,000,000,001-\$10 billion <input type="checkbox"/> \$10,000,000,001-\$50 billion <input type="checkbox"/> More than \$50 billion	
16. Estimated liabilities	<input type="checkbox"/> \$0-\$50,000 <input type="checkbox"/> \$50,001-\$100,000 <input type="checkbox"/> \$100,001-\$500,000 <input type="checkbox"/> \$500,001-\$1 million	<input checked="" type="checkbox"/> \$1,000,001-\$10 million <input type="checkbox"/> \$10,000,001-\$50 million <input type="checkbox"/> \$50,000,001-\$100 million <input type="checkbox"/> \$100,000,001-\$500 million	<input type="checkbox"/> \$500,000,001-\$1 billion <input type="checkbox"/> \$1,000,000,001-\$10 billion <input type="checkbox"/> \$10,000,000,001-\$50 billion <input type="checkbox"/> More than \$50 billion	

Request for Relief, Declaration, and Signatures

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

17. Declaration and signature of authorized representative of debtor

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

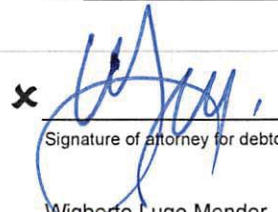
Executed on 05 09 2022
MM / DD / YYYY


Signature of authorized representative of debtor

Margaro Rivera Guzman
Printed name

Title President

18. Signature of attorney


Signature of attorney for debtor

Date 05 09 2022
MM / DD / YYYY

Wigberto Lugo Mender

Printed name

Lugo Mender Group, LLC.

Firm name

100 Carr. 165 Suite 501

Number Street

Guaynabo

City

PR 00968-8052

State ZIP Code

(787) 707-0404

Contact phone

wigberto@lugomender.com

Email address

212304 PR

Bar number

State

Debtor CAPETE CORPORATION
Name

Case number (if known) _____

Fill in this information to identify your case:

United States Bankruptcy Court for the:

DISTRICT OF PUERTO RICO

Case number (if known) _____

Chapter 11

☐ Check if this an amended filing

FORM 201. VOLUNTARY PETITION

Pending Bankruptcy Cases Attachment

Debtor	<u>Caribbean Motel Corporation</u>	Relationship to you	<u>Stockholder</u>
District	<u>USBC- District of Puerto Rico</u>	When	<u>6/15/21</u>
		Case number, if known	<u>21-01831</u>
Debtor	<u>MAM Corporation</u>	Relationship to you	<u>Stockholder</u>
District	<u>USBC- District of Puerto Rico</u>	When	<u>5/09/22</u>
		Case number, if known	_____

Capete Corporation

CORPORATE RESOLUTION

Capete Corporation, a corporation constituted per the laws and within the Commonwealth of Puerto Rico, by this certify:

At the meeting celebrated on May 6, 2022, the Board of Directors of Capete Corporation agreed to file a bankruptcy petition under the provisions of Chapter 11 of the Bankruptcy Code.

That we have been informed and counseled as of the meaning of Chapter 11 of the Bankruptcy Code.

At the meeting celebrated on the same date, the filing for bankruptcy under Chapter 11 of the Federal Bankruptcy Law was unanimously approved by officers and stockholders.

That it was also agreed that the services of Attorney Wigberto Lugo-Mender and Alexis Betancourt-Vincenty of Lugo Mender Group LLC would be retained for such purposes.

That for the best interest of the company we authorize to file a petition for relief under Chapter 11 of the Bankruptcy Code at the Bankruptcy Court for the District of Puerto Rico. Also, we authorize Mr. Margaro Rivera-Guzmán, Esq., President of the Corporation execute such petition and to represent the corporation at this bankruptcy proceeding, including the authority to contract services required or to be performed in this matter.

I sign this Resolution today the 6 day of May 2022.



Secretary

Capete Corporation
#96133
27.Nov.1996

(Corporate Seal)

Fill in this information to identify the case:

Debtor name CAPETE CORPORATION
 United States Bankruptcy Court for the: DISTRICT OF PUERTO RICO
 Case number (if known): _____

☐ Check if this is an amended filing

Official Form 204

Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders

12/15

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an insider, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
CRIM PO Box 195387 San Juan, PR 00936-5387	www.crimpr.gov	Land of 1.74 Cdas located in Quemados Ward, San Lorenzo PR Land No. 9878 Unrecorded in the Registry of Property		\$55,769.87	\$200,000.00	\$32,075.98
CRIM PO Box 195387 San Juan, PR 00936-5387		Land of 3.0954 cdas located at Quemado Ward, San Lorenzo, PR , with real properties used as "Motel" (Land #4,322)		\$84,004.17	\$652,272.00	\$5,774.89
CRIM PO Box 195387 San Juan, PR 00936-5387		Lot of land of 788.0863 sq mts located at Quemados Ward, San Lorenzo PR Land No. 20234 Unrecorded in the Registry of Property		\$8,501.64	\$80,000.00	\$3,343.03
OSP Consortium LLC PO Box 190085 San Juan, PR 00919		First Mortgage MAM Corporation				\$2,417,869.44
OSP Consortium LLC PO Box 190085 San Juan, PR 00919		Land of 3.0954 cdas located at Quemado Ward, San Lorenzo, PR , with real properties used as "Motel" (Land #4,322)		\$2,423,265.00	\$652,272.00	\$1,854,997.17
State Insurance Fund Corp. PO Box 365028 San Juan, PR 00936-5028		Workmen's Insurance				\$8,189.38

Fill in this information to identify the case:

Debtor name CAPETE CORPORATION

United States Bankruptcy Court for the: DISTRICT OF PUERTO RICO

Case number (if known) _____

☐ Check if this is an amended filing

Official Form 202

Declaration Under Penalty of Perjury for Non-Individual Debtors

12/15

An individual who is authorized to act on behalf of a non-individual debtor, such as a corporation or partnership, must sign and submit this form for the schedules of assets and liabilities, any other document that requires a declaration that is not included in the document, and any amendments of those documents. This form must state the individual's position or relationship to the debtor, the identity of the document, and the date. Bankruptcy Rules 1008 and 9011.

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Declaration and signature

I am the president, another officer, or an authorized agent of the corporation; a member or an authorized agent of the partnership; or another individual serving as a representative of the debtor in this case.

I have examined the information in the documents checked below and I have a reasonable belief that the information is true and correct:

- ☐ *Schedule A/B: Assets—Real and Personal Property* (Official Form 206A/B)
- ☐ *Schedule D: Creditors Who Have Claims Secured by Property* (Official Form 206D)
- ☐ *Schedule E/F: Creditors Who Have Unsecured Claims* (Official Form 206E/F)
- ☐ *Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G)
- ☐ *Schedule H: Codebtors* (Official Form 206H)
- ☐ *Summary of Assets and Liabilities for Non-Individuals* (Official Form 206Sum)
- ☐ *Amended Schedule*
- ☒ *Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders* (Official Form 204)
- ☐ Other document that requires a declaration _____

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 9, 2022

X 
Signature of individual signing on behalf of debtor

Margaro Rivera Guzman
Printed name

President
Position or relationship to debtor

Fill in this information to identify the case:

Debtor name CAPETE CORPORATION

United States Bankruptcy Court for the: DISTRICT OF PUERTO RICO

Case number (if known) _____

☐ Check if this is an amended filing

Official Form 206Sum

Summary of Assets and Liabilities for Non-Individuals

12/15

Part 1: Summary of Assets

1. **Schedule A/B: Assets-Real and Personal Property** (Official Form 206A/B)

1a. **Real property:**

Copy line 88 from *Schedule A/B*..... \$ 932,272.00

1b. **Total personal property:**

Copy line 91A from *Schedule A/B*..... \$ 59,441.94

1c. **Total of all property:**

Copy line 92 from *Schedule A/B*..... \$ 991,713.94

Part 2: Summary of Liabilities

2. **Schedule D: Creditors Who Have Claims Secured by Property** (Official Form 206D)

Copy the total dollar amount listed in Column A, *Amount of claim*, from line 3 of *Schedule D*..... \$ 2,571,540.68

3. **Schedule E/F: Creditors Who Have Unsecured Claims** (Official Form 206E/F)

3a. **Total claim amounts of priority unsecured claims:**

Copy the total claims from Part 1 from line 5a of *Schedule E/F*..... \$ 8,189.38

3b. **Total amount of claims of nonpriority amount of unsecured claims:**

Copy the total of the amount of claims from Part 2 from line 5b of *Schedule E/F*..... +\$ 2,417,869.44

4. **Total liabilities**
Lines 2 + 3a + 3b

\$ 4,997,599.50

United States Bankruptcy Court
District of Puerto Rico

In re CAPETE CORPORATION

Debtor(s)

Case No.

Chapter

11

LIST OF EQUITY SECURITY HOLDERS

Following is the list of the Debtor's equity security holders which is prepared in accordance with rule 1007(a)(3) for filing in this Chapter 11 Case

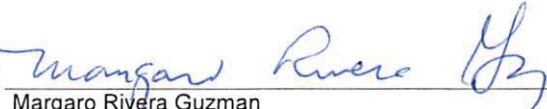
Name and last known address or place of business of holder	Security Class	Number of Securities	Kind of Interest
Margarita Rivera Guzman PO Box 518 Las Piedras, PR 00771	Common	50%	Shareholder
Rebecca Rivera Rosa PO Box 518 Las Piedras, PR 00771	Common	50%	Shareholder

DECLARATION UNDER PENALTY OF PERJURY ON BEHALF OF CORPORATION OR PARTNERSHIP

I, the President of the corporation named as the debtor in this case, declare under penalty of perjury that I have read the foregoing List of Equity Security Holders and that it is true and correct to the best of my information and belief.

Date May 9, 2022

Signature


Margarita Rivera Guzman

Penalty for making a false statement of concealing property: Fine of up to \$500,000 or imprisonment for up to 5 years or both.
18 U.S.C. §§ 152 and 3571.

**United States Bankruptcy Court
District of Puerto Rico**

In re CAPETE CORPORATION

Debtor(s)

Case No.

Chapter

11

VERIFICATION OF CREDITOR MATRIX

I, the President of the corporation named as the debtor in this case, hereby verify that the attached list of creditors is true and correct to the best of my knowledge.

Date: May 9, 2022



Margaro Rivera Guzman/President
Signer/Title

CAPETE CORPORATION
PO BOX 518
LAS PIEDRAS, PR 00771

OSP CONSORTIUM LLC
PO BOX 190085
SAN JUAN, PR 00919

WIGBERTO LUGO MENDER
LUGO MENDER GROUP, LLC
100 CARR 165 SUITE 501 GUAYNABO,
PR 00968-8052

PR DEPARMENT OF LABOR
PO BOX 21361
SAN JUAN, PR 00928-1361

ADRIAN J HILERA PSC
880 BOULEVARD TITO CASTRO
ONE PLAZA SUITE 102
PONCE, PR 00716

PR DEPARTMENT OF TREASURY
BANKRUPTCY SECTION 424
PO BOX 9024140
SAN JUAN, PR 00902-4140

CONDADO 2 LLC
1519 AVE PONCE DE LEON
SUITE 311
SAN JUAN, PR 00908

PR TOURISM CORPORATION
PO BOX 9023960
SAN JUAN, PR 00902-3960

CRIM
PO BOX 195387
SAN JUAN, PR 00936-5387

REBECCA RIVERA ROSA
PO BOX 518
LAS PIEDRAS, PR 00771

INTERNAL REVENUE SERVICES
PO BOX 7346
PHILADELPHIA, PA 19101-7346

STATE INSURANCE FUND CORP.
PO BOX 365028
SAN JUAN, PR 00936-5028

JOSE LUIS MARTINEZ SARIOGO ESQ
880 BOULEVARD TITO CASTRO
ONE PLAZA SUITE 102
PONCE, PR 00716

MARGARO RIVERA GUZMAN
PO BOX 518
LAS PIEDRAS, PR 00771

MUNICIPALITY OF SAN LORENZO
PO BOX 1289
SAN LORENZO, PR 00754-1289

B2030 (Form 2030) (12/15)

**United States Bankruptcy Court
District of Puerto Rico**

In re CAPETE CORPORATION

Debtor(s)

Case No.

Chapter

11

DISCLOSURE OF COMPENSATION OF ATTORNEY FOR DEBTOR(S)

1. Pursuant to 11 U.S.C. § 329(a) and Fed. Bankr. P. 2016(b), I certify that I am the attorney for the above named debtor(s) and that compensation paid to me within one year before the filing of the petition in bankruptcy, or agreed to be paid to me, for services rendered or to be rendered on behalf of the debtor(s) in contemplation of or in connection with the bankruptcy case is as follows:

For legal services, I have agreed to accept	\$	<u>4,000.00</u>
Prior to the filing of this statement I have received	\$	<u>4,000.00</u>
Balance Due	\$	<u>0.00</u>

2. The source of the compensation paid to me was:

☒ Debtor ☐ Other (specify):

3. The source of compensation to be paid to me is:

☒ Debtor ☐ Other (specify):

4. ☒ I have not agreed to share the above-disclosed compensation with any other person unless they are members and associates of my law firm.

☐ I have agreed to share the above-disclosed compensation with a person or persons who are not members or associates of my law firm. A copy of the agreement, together with a list of the names of the people sharing in the compensation is attached.

5. In return for the above-disclosed fee, I have agreed to render legal service for all aspects of the bankruptcy case, including:

- a. Analysis of the debtor's financial situation, and rendering advice to the debtor in determining whether to file a petition in bankruptcy;
- b. Preparation and filing of any petition, schedules, statement of affairs and plan which may be required;
- c. Representation of the debtor at the meeting of creditors and confirmation hearing, and any adjourned hearings thereof;
- d. [Other provisions as needed]

Negotiations with secured creditors to reduce to market value; exemption planning; preparation and filing of reaffirmation agreements and applications as needed; preparation and filing of motions pursuant to 11 USC 522(f)(2)(A) for avoidance of liens on household goods.

6. By agreement with the debtor(s), the above-disclosed fee does not include the following service:

Representation of the debtors in any dischargeability actions, judicial lien avoidances, relief from stay actions or any other adversary proceeding.

CERTIFICATION

I certify that the foregoing is a complete statement of any agreement or arrangement for payment to me for representation of the debtor(s) in this bankruptcy proceeding.

May 9, 2022

Date

/s/ Wigberto Lugo Mender

Wigberto Lugo Mender 212304

Signature of Attorney

Lugo Mender Group, LLC

100 Carr 165 Suite 501

Guaynabo, PR 00968-8052

(787) 707-0404

Name of law firm